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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KIMBERLEE WILLIAMS, ET AL.,

Plaintiffs,

V.

BASF CATALYSTS LLC, ET AL.,

Defendants.

[illegible]

No. 2:11-cv-01754 (JLL) (JAD)

CIVIL ACTION

**DECLARATION OF
JUSTIN T. QUINN, ESQ.**

I, Justin T. Quinn, of full age, hereby declare as follows:

1. I am an attorney at law and a partner with the law firm Robinson Miller LLC in Newark, New Jersey.

2. I am one of the counsel of record for Defendant BASF Catalysts LLC in this action.

3. Attached hereto as **Exhibit A** is a true and correct excerpt of an oral argument hearing transcript before the Special Discovery Master dated April 2, 2018.

4. Attached hereto as **Exhibit B** is a true and correct copy of a U.S. Geological Survey Preliminary Report dated April 12, 1951.

5. Attached hereto as **Exhibit C** is a true and correct copy of Alfred Chidester's Geological Survey Study titled "Petrology and Geochemistry of Selected Talc-bearing Ultramafic Rocks and Adjacent Country Rocks in North-Central Vermont" dated March 3, 1949.

6. Attached hereto as **Exhibit D** is a true and correct copy of the Deposition Transcript of Alfred H. Chidester dated October 23, 1983 in the matter of Westfall v. Whittaker, Clark & Daniels, et al.

7. Attached hereto as **Exhibit E** is a true and correct copy of the Maryanne G. Boundy, et al. study titled "Occupational Exposures to Non-Asbestiform Talc in Vermont."

8. Attached hereto as **Exhibit F** is a true and correct copy of the Sherry G. Selevan, et al. study titled “Mortality Patterns Among Miners and Millers of Non-Asbestiform Talc: Preliminary Report.”

9. Attached hereto as **Exhibit G** is a true and correct copy of a letter from John Dement of the Department of Health, Education, and Welfare Public Health Service Center for Disease Control to William Burgess of Harvard University School of Public Health dated April 19, 1976.

10. Attached hereto as **Exhibit H** is a true and correct copy of a National Institute for Occupational Safety and Health Bulletin titled “Asbestos Fibers and Other Elongated Mineral Particles: State of the Science and Roadmap for Research” dated January 20, 2009.

11. Attached hereto as **Exhibit I** is a true and correct copy of an Engelhard Minerals and Chemical Corp. Customer Report dated July 8, 1971.

12. Attached hereto as **Exhibit J** is a true and correct copy of an Engelhard Minerals and Chemical Corp. Technical Service Request dated October 3, 1972.

13. Attached hereto as **Exhibit K** is a true and correct copy of a letter from Lucy McCrone of Walter C. McCrone & Associates, Inc. to Emil Triglia of Engelhard Minerals and Chemicals Corp. dated December 7, 1973.

14. Attached hereto as **Exhibit L** is a true and correct copy of an Engelhard Minerals and Chemical Corp. Technical Service Request dated December 17, 1973.

15. Attached hereto as **Exhibit M** is a true and correct copy of an Engelhard Minerals and Chemical Corp. Technical Service Request dated December 2, 1977.

16. Attached hereto as **Exhibit N** is a true and correct copy of an Engelhard Minerals and Chemical Corp. Technical Service Request dated February 1, 1979.

17. Attached hereto as **Exhibit O** is a true and correct copy of a conversation memorandum concerning the events of a February 6, 1979 visit of representatives from Exxon, Ribelin, and Engelhard Minerals and Chemical Corp. regarding Minerals Present in Emtal Talcs.

18. Attached hereto as **Exhibit P** is a true and correct copy of the Declaration of Drew Van Orden in this matter dated January 15, 2018.

19. Attached hereto as **Exhibit Q** is a true and correct copy of an Engelhard Minerals and Chemical Corp. inter-department memorandum from P. Gale to E. Triglia dated April 11, 1979.

20. Attached hereto as **Exhibit R** is a true and correct copy of BASF Catalyst LLC's Brief in Opposition to Plaintiff's Motion to Compel dated April 24, 2018. This document was filed *ex parte* and *in camera* before the Special Discovery Master and is also being filed *ex parte* and *in camera* here.

21. Attached hereto as **Exhibit S** is a true and correct copy of an email from Justin Quinn of Robinson Miller LLC to the Special Discovery Master dated May 1, 2018, 9:34 AM.

22. Attached hereto as **Exhibit T** is a true and correct copy of an email from Jared Placitella of Cohen, Placitella & Roth, P.C. to Justin Quinn of Robinson Miller LLC and the Special Discovery Master dated May 1, 2018, 10:17 AM.

23. Attached hereto as **Exhibit U** is a true and correct copy of an email from Jared Placitella of Cohen, Placitella & Roth, P.C. to the Special Discovery Master dated May 3, 2018, 4:49 PM.

24. Attached hereto as **Exhibit V** is a true and correct copy of an Engelhard Minerals and Chemical Corp. memorandum from E. Triglia dated May 14, 1979. This document is privileged and so was filed *ex parte* and *in camera* before the Special Discovery Master and is also being filed *ex parte* and *in camera* here.

25. Attached hereto as **Exhibit W** is a true and correct copy of an Engelhard Minerals and Chemical Corp. memorandum from E. Triglia to J. Brush, et al. dated May 2, 1979. This document is privileged and so was filed *ex parte* and *in camera* before the Special Discovery Master and is also being filed *ex parte* and *in camera* here.

26. Attached hereto as **Exhibit X** is a true and correct copy of a Talc Meeting Memorandum dated May 17, 1979.

27. Attached hereto as **Exhibit Y** is a true and correct copy of an Engelhard Minerals and Chemical Corp. memorandum from J. Brush to R. Graf, G. Hemstock and R. McIlwain dated June 18, 1979. This document is privileged and so was filed

ex parte and *in camera* before the Special Discovery Master and is also being filed *ex parte* and *in camera* here.

28. Attached hereto as **Exhibit Z** is a true and correct copy of a letter from James Hubbard of Georgia Institute of Technology's Engineering Experiment Station to E. Triglia of Engelhard Minerals & Chemicals Corp. dated September 19, 1979.

29. Attached hereto as **Exhibit AA** is a true and correct copy of Plaintiff's PowerPoint Slides from February 23, 2018 hearing in this matter.

30. Attached hereto as **Exhibit BB** is a true and correct copy of R. Edward Lomas' Expert Report dated April 12, 2013.

31. Attached hereto as **Exhibit CC** is a true and correct copy of an Engelhard Minerals and Chemical Corp. inter-department memorandum from E. Triglia to G. Hemstock dated May 22, 1979.

32. Attached hereto as **Exhibit DD** is a true and correct copy of an Engelhard Minerals and Chemical Corp. Technical Service Request dated May 9, 1979.

I declare under penalty of perjury that the above statements are true and correct to the best of my knowledge and belief.

s/ Justin T. Quinn
Justin T. Quinn

Dated: May 17, 2018